

CHAPTER 7.0 ALTERNATIVES TO THE PROPOSED PROJECT

7.1 Introduction

7.1.1 Purpose and Scope

CEQA requires that an EIR describe a “reasonable” range of alternatives to the project, or to the location of the project, which could feasibly attain most of the basic objectives of the project, and to evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed project and evaluates them as required by CEQA.

Section 15126.6(c) directs that an EIR should focus on alternatives capable of: (1) eliminating or reducing significant adverse environmental effects of a proposed project and (2) feasibly accomplishing most of the basic project objectives. With the exception of air quality, project-related impacts have been minimized or avoided through project design or mitigated to a less than significant level through the imposition of mitigation measures. The discussion of alternatives in this Draft EIR reviews a range of alternatives, including the “No Project” alternative as prescribed by the State CEQA Guidelines, which satisfies this requirement.

This section analyzes several potentially feasible alternatives to the proposed project, including:

- No Project/No Development
- Alternative Design
- Hunt Club
- Golf Course

7.1.2 Evaluation of Project Alternatives

According to the CEQA Guidelines (Section 15126.6[a]), an EIR must “... *describe a range of reasonable alternatives for the project, or to the location of the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*” The Guidelines go on to indicate that alternatives that are capable of substantially lessening any significant effects of the Project must be examined, “... *even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.*” The Guidelines further indicate “... *that the EIR need examine in detail only the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project*” (CEQA Guidelines Section 15126.6[c]). Thus the ability of an alternative to attain most of the basic project objectives is central to the consideration of alternatives to the proposed project.

For each alternative, the analysis presented in this section:

- Describes the alternative;
- Discusses the impacts of the alternative and evaluates the significance of those impacts; and,

- Evaluates the alternative relative to proposed project, specifically addressing project objectives and the elimination or reduction of potentially significant impacts.

7.1.3 Identification of Impacts

After describing the alternative, this Draft EIR evaluates the impacts of the alternative. The major resource areas included in the detailed impact analysis in Section 4.0 are included in this section. The potential environmental consequences are identified and described in the analysis for each of the alternatives identified in Section 7.4.

7.2 Environmentally Superior Alternative

CEQA requires that the EIR identify the environmentally superior alternative among all of the alternatives considered, including the proposed project. The No Development alternative identified and analyzed in Chapter below will eliminate the potentially significant long-term unavoidable adverse air quality impacts that would occur as a result of project implementation. CEQA requires that if the “no project” alternative is the environmentally superior alternative, an environmentally superior alternative among the other alternatives shall be identified. Based on the comparative analysis of alternatives provided in this chapter, the proposed project would be considered to be environmentally superior in that its implementation would result in the least adverse environmental impacts. As indicated in Table 7-1 (refer to Section 7.

7.4 Alternatives Rejected from Further Consideration

Given the limited nature of the proposed project and, most importantly, the limited potential for development options based on the adopted Specific Plan and Grant of Easement that regulates development of the subject property, the range of potential land use alternatives is also limited to those identified above and evaluated in the analysis presented in Section 7.5. No other alternatives were considered.

7.5 Analysis of Alternatives

7.5.1 No Project/No Development

The “No Project/No Development” alternative would not allow any additional development to occur, including that proposed by the applicant. Therefore, this alternative would not result in any of the impacts identified for the proposed project, including loss of sensitive habitat and sensitive species (i.e., coastal sage scrub and coastal California gnatcatcher), short-term and long-term air pollutant emissions (albeit less than significant), and landform alteration associated with grading and site development. The site would remain as open space and serve both an open space and a scenic resources as identified by the Coto de Caza Specific Plan. No significant impacts would occur and no mitigation measures would be required.

7.5.2 Alternative Design

This design shown in this alternative reflects the original land use proposal of the project applicant. It includes development of the site with seven single-family custom residences within the 126.51-acre property as illustrated in Exhibit 7-1. However, as indicated in that exhibit, the seven lots would be larger than those currently proposed, ranging in size from three acres to six acres. In addition, the lots would not be “clustered” and would extend over a larger area of the subject property to encompass approximately 38 of the nearly 127-acre site. Vehicular access to the site would be provided via the same extension from Van Gogh Way in Tract 15245.

Land Use/Relevant Planning

This alternative is consistent with the County’s 1B – Suburban Residential General Plan land use designation and the Rural Residential designation allocated by the Coto de Caza Specific Plan for the subject property. In addition, this alternative would also be consistent with relevant General Plan and Specific Plan policies, including that which permits grading (and development) within the open space area of PA 10. Similar to the proposed project, although residential development is not permitted within the Open Space, the Coto de Caza Specific Plan includes a series of special regulations, including the provision to allow minor shifts of development of up to 10 percent in an area shown as a Major Open Space area on Exhibit 3 in the Specific Plan. Like the proposed project, this alternative would allow for the development of seven rural residential estate dwelling units on the subject property. Although the dwelling units would be located outside the existing development footprint identified in the Coto de Caza Specific Plan, similar to the proposed project, this alternative would also result in a greater amount of open space than the minimum 378 acres mandated for PA 10 in the Coto de Caza Specific Plan. As indicated above, such a “shift” may be permitted, subject to County approval, in accordance with the Coto de Caza Specific Plan. No significant land use impacts would occur as a result of implementing the alternative design.

Drainage and Hydrology

With the more extensive grading solution and impervious surfaces with additional roadway length and building area for the homes, it is anticipated that post-development surface runoff would be greater than the proposed project; however, the site would be designed to not only accommodate the additional runoff, it would be designed to comply with the applicable water quality requirements through the implementation of BMPs prescribed in the SWPPP that would be implemented during construction as well as post-development (i.e., operational) BMPs required in the WQMP in order to ensure that surface discharges do not exceed the established thresholds.

Biological Resources

Although similar grading techniques (i.e., contour grading) would also be implemented with this alternative, grading for the building pads and, in particular, for the roadways would be greater when compared to the proposed project. This grading would result in potentially greater impacts to the sensitive coastal sage scrub habitat and other sensitive plant species, including the many-stemmed dudleya and intermediate Mariposa lily. In addition, it is anticipated that this alternative would result in greater impacts by affecting three of the four pairs of California gnatcatchers that occupy the site, compared to only one that would be impacted by the proposed project. All of the other impacts identified for the proposed project would also occur with the implementation of the Alternative Design, including: potential elimination of burrowing owl habitat; introduction of human activities that could result in indirect and direct impacts on the sensitive habitat and species (e.g., introduction of dust, noise, light and glare, domestic animals, etc.); use of household hazardous materials (e.g., insecticides, herbicides, etc., for landscape treatment, etc.). These impacts also require mitigation to ensure that they are reduced to a less than significant level.

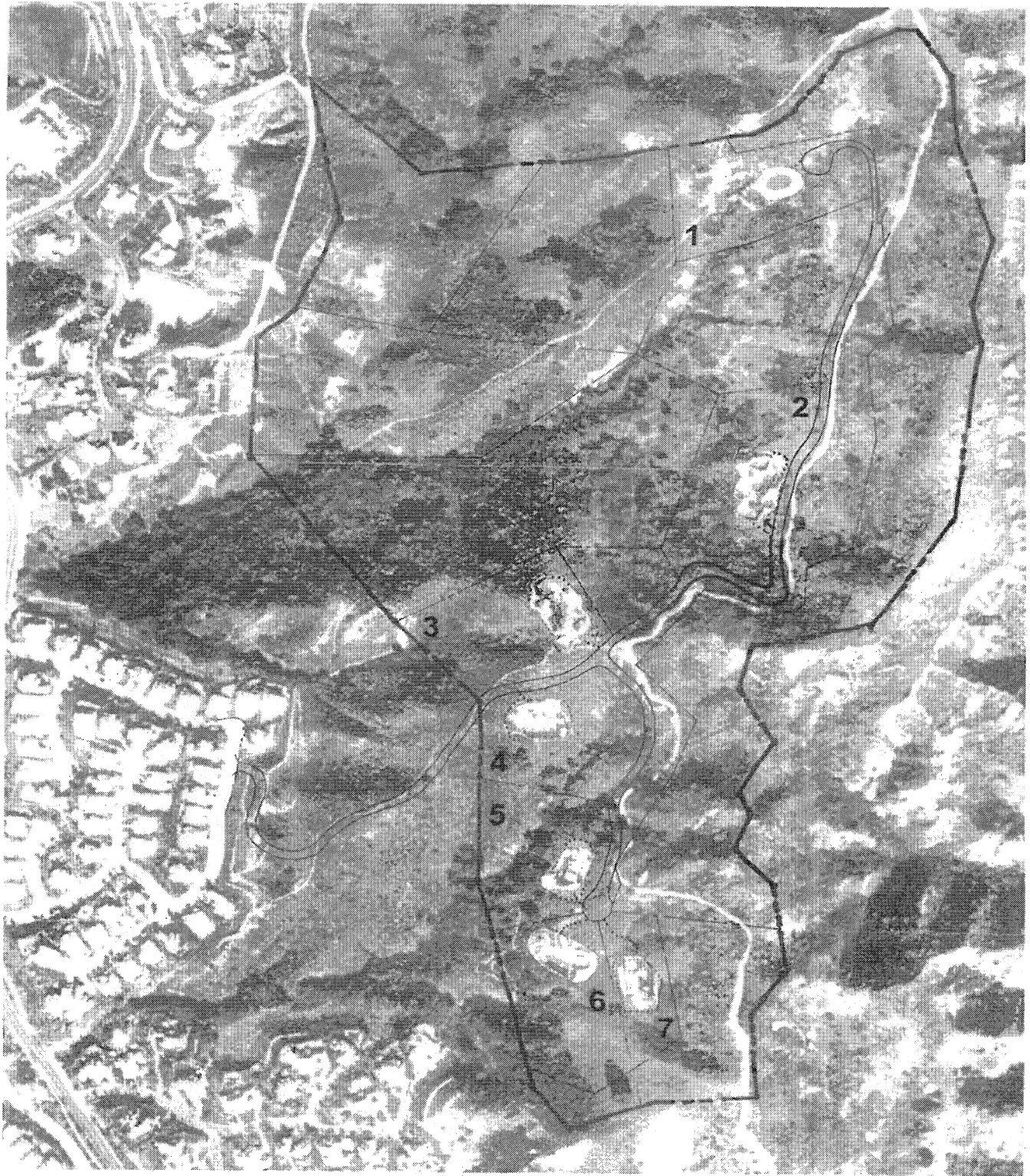


Exhibit 7-1
Alternative Design

Soils and Geology

As indicated above, this alternative design, which is characterized by a longer circulation system to serve the seven lots, would require additional grading and landform alteration. In particular, the two northernmost lots and dwelling units would be located in the vicinity of an existing landslide and would, therefore, necessitate extensive additional landform alteration to stabilize the landslide to protect the two dwelling units from damage associated with slope failure. Therefore, this impact would be substantially greater when compared to the proposed project, necessitating more mitigation when compared to the proposed project. Other potential seismic impacts (i.e., groundshaking) would be the same as those described for the proposed project. As indicated in Section 4.4, future residential development would be subject to moderate to severe groundshaking that may occur on one of the active regional faults. Therefore, the homes would require the same level of protection through design as identified for the proposed project.

Aesthetics

Similar to the proposed project, the seven dwelling units proposed for this alternative have been sited within the limits of the 126.51-acre property to minimize potentially significant visual impacts; however, more of the proposed lots are located closer to the (public) perimeter trails. As previously indicated, contour grading techniques will be employed to minimize landform alteration and the building pads have been located within the limits of the property to reduce the visual exposure of the homes within the viewshed. In addition, like the proposed project, landscaping would also be incorporated into the project design to ensure that potential visual impacts are minimized.

- **Ability to Achieve Project Objectives**

This alternative, which includes the development of seven single-family residential dwelling units on the project site, would achieve all of the objectives envisioned by the proposed project, which include creating a sustainable residential community that is consistent with the goals and objectives of the Coto de Caza Specific Plan and adopted County plans and policies, improving trail access, minimizing visual impacts, etc.

- **Elimination/Reduction of Significant Impacts**

As indicated above, implementation of the proposed project at the Alternative Site would not result in the elimination of the potentially significant impacts. Overall, this alternative would result in the same or greater impacts as the proposed project, including potentially significant impacts to biological resources, increased geotechnical impacts associated with grading and landform alteration, and increased runoff. Furthermore, it would disperse development throughout more of the site, thereby reducing the integrity of the remaining open space.

- **Comparative Merits**

Although this alternative would achieve all of the project objectives, the potentially significant environmental impacts would be the same or exceed those identified for the proposed project, necessitating the same or a greater level of mitigation. This alternative is not environmentally superior to the proposed project.

7.5.3 Hunt Club

The “No Project” alternative would encompass development of the subject property in accordance with the adopted Coto de Caza Specific Plan, which identifies the area in which the 127-acre property is located as Rural Residential; however, the Specific Plan also identifies the area as a “Scenic Area” within the “Major Open Space Areas” designated within Coto de Caza. Nonetheless, the project site is subject to the provision of a Grant of Easement that has been recorded at the County of Orange. The Grant of Easement stipulates:

“The property shall only be used for ‘Open Space’ (Scenic Area), ‘Community Facilities’ or any combination of the foregoing. ‘Community Facilities’ permits such uses as:” (1) utility buildings for electrical, water, sewage, telephone, etc., (2) community information centers, and (3) recreational facilities. ‘Recreational Facilities’ includes facilities with primary uses being recreation of any type including, without limitation, golf, equestrian, hunting related facilities, a hunt lodge, lounge, office space, kitchen and dining room facility, storage, maintenance, workshop and restroom facilities, shooting fields, dog training facility with dog training lake, duck tower and shooting field, crazy quail facility and shooting field, lakes, ponds, retaining walls, parking facilities, access roads and other ancillary structures and improvements in connection therewith. Such uses of the Property shall include the right to develop, construct (including, without limitation, grade, excavate, recompact, fill, irrigate and landscape the Property), improve, reconstruct, renew, replace, remove, inspect, maintain and repair the Property and all ancillary facilities and structures in connection therewith.”

Based on the land uses permitted in the Grant of Easement, the land use alternative evaluated in this section of the Draft EIR includes development of the nearly 127-acre property with a variety of recreational uses as identified above for “Recreational Facilities,” including hunting facilities and a lodge, shooting facilities, dog training facilities, along with ancillary components (e.g., restroom facilities, parking, etc.) permitted by the Grant of Easement. As permitted in the Grant of Easement, development of the site with structures is limited to 15 percent of the total site area. A potential development plan is illustrated on Exhibit 7-2.

Land Use/Relevant Planning

This land use concept (refer to Exhibit 7-2) would be consistent with the land uses permitted by the Coto de Caza Specific Plan as provided in the Grant of Easement recorded for the property. Both the Orange County General Plan and Coto de Caza Specific Plan, through the Grant of Easement approved for PA 10 would permit a Hunt Club, including the grading and site alteration associated with such a land use. In order to be consistent with the Coto de Caza Specific Plan, however, the remaining open space must equal or exceed the amount allocated for PA 10 (i.e., 378 acres). Therefore, this alternative would be consistent with the long-term goals and objectives articulated in the Specific Plan as well as the Orange County General Plan.

Drainage and Hydrology

Because the Hunt Club alternative would require substantially more grading to implement in order to create larger pads for the proposed structures, parking areas and related components, the natural drainage features would be altered to a greater degree when compared to the proposed project. For example, up to 15 acres of structures, which would constitute impervious surfaces, could be developed on the site, which is substantially greater than the eight acres currently proposed to be impervious. Not only would this alternative result in increase runoff, but existing drainage features and patterns may also be directly impacted.

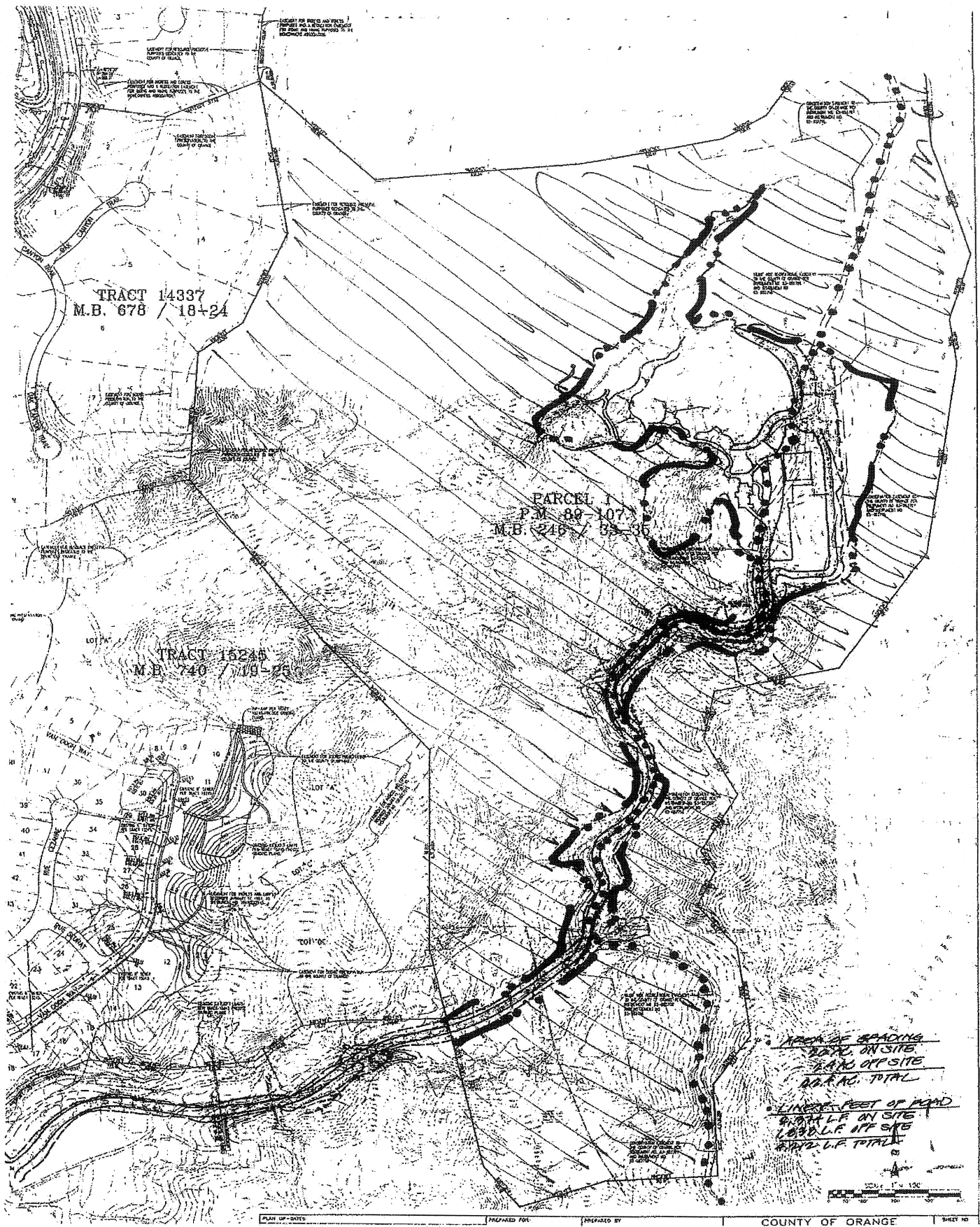


Exhibit 7-2
Hunt Club Alternative

In addition to the hydrologic and hydraulic impacts that could be anticipated from this alternative, it is possible that potentially significant water quality impacts associated with the use of herbicides, fertilizers and insecticides and other urban pollutants (e.g., metal debris associated with the shooting of firearms, etc.) could enter both the surface and groundwater if not properly addressed through the BMPs prescribed in the SWPPP and WQMP.

Biological Resources

This alternative would result in potentially greater grading and landform alteration in order to accommodate the recreational elements of the Hunt Club. A substantially greater portion of the property would be required to accommodate this land use. As a result, the grading would result in greater impacts to the existing biological resources that occur on the site, including the sensitive habitat and species. It is anticipated that more coastal sage scrub habitat would be impacted as well as impacts to the coastal California gnatcatcher, coastal cactus wren, and other sensitive plant species (e.g., many-stemmed dudleya and intermediate Mariposa lily). Other impacts identified for the proposed project would also occur, including the direct and indirect effects associated with the introduction of human activities in areas that currently support sensitive species. These impacts would include dust and noise from grading and construction; noise, light and glare associated with Hunt Club activities (e.g., barking dogs, gunshots, etc); and the introduction of domestic animals. Therefore, the nature and extent of the potential impacts associated with this alternative would require the same mitigation measures as those prescribed for the proposed project in order to reduce the potential impacts to a less than significant level.

Soils and Geology

As indicated previously, the grading solution required to accommodate the Hunt Club alternative would result in significantly greater landform alteration, which would be necessary to create the larger building pads for the clubhouse, parking lot(s) and ancillary facilities that are associated with this use. Any proposed structure(s), like the proposed project and other development within Coto de Caza, would be subject to moderate to strong ground shaking associated with seismic activity on one active regional faults. In addition, however, this alternative would require extensive remedial grading in order to mitigate the potential unstable landslide in the northeastern limits of the site. In addition, the access roadway that would be required would also necessitate significant grading. Therefore, in addition to the landslide remediation, which would not be required for the proposed project, which is located south of the unstable areas in the vicinity of the landslide, the Hunt Club alternative would also be subject to the same mitigation measures prescribed for the proposed project to minimize the potential adverse effects resulting from seismic activity and the existing on-site soils.

Aesthetics

Although this low intensity land use is permitted by the Grant of Easement, depending on its location, portions of this alternative would be highly visible from the perimeter trails, which are considered to be public vantage points. It is possible that structures and other components of the Hunt Club (e.g., parking lot, access road, etc.) would be exposed in the foreground from several locations along the ridgeline trails along the eastern limits of the property. While the facilities must comply with the design guidelines prescribed in the Coto de Caza Specific Plan and related document regulating development on the property, it would be necessary to incorporate a landscaping plan that would minimize the visual impacts of the proposed structure(s) and related features. In addition, depending on the location of the access road, it is possible that more extensive grading would also be required, exposing this feature to other public vantage points.

- Ability to Achieve Project Objectives

Although this alternative would achieve some of the project alternatives (e.g., provide a land use that is consistent with the General Plan and Specific Plan, provide open space, enhance trail facilities, etc.), the most significant project objectives, those related to the provision of additional residential development consistent with the intensity of development permitted by the Coto de Caza Specific Plan) would not be achieved.

- Elimination/Reduction of Significant Impacts

As indicated above, implementation of the Hunt Club alternative would not result in the elimination of any of the environmental impact; this alternative would result in the same or greater impacts than the proposed project, including potentially significant impacts to biological resources (i.e., loss of sensitive habitat and species), soils and geology (extensive grading necessary to remediate existing landslides that exist within the subject property) potential visual impacts due to its increased visibility from the perimeter trails and public vantage points, and increased surface runoff and potential water quality impacts resulting from gun power and metal residue associated with the Hunt Club activities. In addition, it is expected that this alternative could have additional impacts not that would not occur as a result of the proposed project, including noise associated with shooting and dogs, additional traffic generated within the nearby community, which would also result in increased mobile-source pollutant emissions, etc.

- Comparative Merits

As indicated above, this alternative to the proposed project would not achieve the most essential of the project objectives and would also result in the same or greater environmental impacts when compared to the proposed project. Therefore, this alternative is not environmentally superior to the proposed project.

7.5.4 Golf Course

As indicated above, the recorded Grant of Easement would allow for the development of a variety of recreational alternatives, including a golf course. Although it is possible that a regulation golf course could be accommodated on the 127-acre property, such a course would require virtually the entire site. Therefore, due to the topographic constraints of the site, this alternative would include the development of an executive golf course on the nearly 127-acre property. As previously indicated, the area within the 127-acre property allocated to structures would be limited to 15 percent. In order to comply with the requirement that a minimum of 387 acres of open space remain in PA 10, the golf course would be limited to approximately 80 acres.

Land Use/Relevant Planning

As permitted by the Grant of Easement, a golf course is also a permitted use within the PA 10 open space and scenic area designated by the Coto de Caza Specific Plan, as long as at least 387 acres of open space remain after development. Due to the topographic character of the site, it is anticipated that extensive grading would be required to accommodate either a 9- or 18-hole executive course, including a small clubhouse and ancillary facilities. As indicated above, this project would be consistent with the permitted uses within PA 10, although it would be subject to the stipulation in the Coto de Caza Specific Plan that requires the reservation of a minimum of 387 acres of open space. The project would be designed to comply with the development standards and design requirements established for the property and would be consistent with the County's General Plan policies and those in the specific plan.

Drainage and Hydrology

With the exception of a clubhouse and ancillary facilities, the majority of the area that would be developed with the golf course would encompass mostly pervious surfaces. Therefore, it is anticipated that surface runoff generated by the proposed project would be less than that anticipated from either the proposed project or other development alternatives. Surface runoff would be accommodated within the golf course and would likely be directed to existing drainage course within the subject property. However, potential water quality impacts resulting from the more extensive use of herbicides, fertilizers, and pesticides could result in potentially greater impacts to water quality if not properly addressed through BMPs, which would be prescribed in the SWPPP and WQMP, which would be required.

Biological Resources

Conversion of the site to a golf course would require extensive landform alteration to accommodate a golf course on the subject property. As a result, this alternative would also result in a greater loss of and, therefore, impacts to, the sensitive biological resources that occupy the site (i.e., coastal sage scrub habitat, coastal California gnatcatcher, and sensitive plant species). In addition, such an alternative could also adversely affect the use of the contiguous natural open space that exists within the nearly 127-acre property. Both direct and indirect impacts identified for the proposed project would also be expected to occur; however, no domesticated animals would be introduced onto the property. Nonetheless, implementation of a golf course would result in greater impacts to biological resources when compared to the proposed project, necessitating the same or additional measures to reduce the impacts to a less than significant level..

Soils and Geology

As indicated above, significant grading and landform alteration would be necessary to approximately 60 percent of the site in order to accommodate an 80-acre executive golf course. Similar to the Hunt Club, it is likely that this grading could include the remediation of the existing landslide. In addition, larger flat building pads would also be required to accommodate the clubhouse, parking lot and other features of the golf course. Therefore, this alternative would be required to implement all of the mitigation measures identified for the proposed project, in addition to the landslide remediation measures.

Aesthetics

Similar to the Hunt Club, because the golf course alternative would encompass a significantly larger development “envelope” and necessitate additional grading and landform alteration, it would be potentially more visible when viewed from one or more locations along the peripheral public trails. The visual perspective would be one of a “manicured” golf course, which would contrast with the character of the surrounding native habitat. While this would not necessarily constitute a significant visual impact, view from the surrounding ridgeline trails would be dramatically changed with the urban features of a golf course within the natural setting. In addition, the potentially more visually obtrusive club clubhouse and parking could also adversely affect views, depending on their location with respect to the public trails, necessitating the incorporation of design measures and/or landscaping to minimize the effect of these features within the public viewshed.

▪ Ability to Achieve Project Objectives

Similar to the Hunt Club alternative, this alternative would not achieve the primary alternative of the project applicant: development of a rural residential component consistent with the density provisions of the Coto de Caza Specific Plan within PA 10. Other alternatives such as enhancing

trail connections, providing open space, etc., however, would be achieved with the golf course alternative.

- Elimination/Reduction of Significant Impacts

Also like the Hunt Club alternative, even an executive golf course would result in the same or greater impacts when compared to the proposed project. For example, additional grading would result in potentially greater impacts to the sensitive biological resources, including sensitive species; the natural drainage features would be altered and, depending on the amount of impervious coverage required for the golf course and the ancillary features (e.g., parking, etc.), potential storm runoff could be increased and potential water quality impacts resulting from the use of greater amounts of herbicides, pesticides, and insecticides for maintenance could also occur. In addition, some of the features could be visually prominent and potential landform alteration necessary to accommodate such a recreational amenity would be significantly greater when compared to the proposed project. Other impacts such as increased vehicular trips and its associated effects of increased noise and pollutant emissions could also occur.

- Comparative Merits

A golf course could achieve some of the project objectives; however, it would not achieve the most improvement objective identified by the project applicant: that of providing rural residential development that is compatible with the nearby development within the Coto de Caza community. Furthermore, this alternative would not result in the reduction of any of the project-related impacts identified in Section 4.0; rather, potential impacts would be the same or greater when compared to the proposed 7-unit residential subdivision. Therefore, this alternative is not environmentally superior to the proposed project.

7.6 Summary of Alternatives

An EIR is required to identify the “environmentally superior” alternative among those evaluated from the reasonable range of alternative analyzed. Section 15126.6(e)(2) of the State CEQA Guidelines mandates that in the event “. . . the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In addition, alternatives identified and evaluated are also intended to achieve project objectives. As indicated in Table 7-1, implementation of the “No Project/No Development” alternative would virtually eliminate all of the potential impacts anticipated to occur as a result of the proposed project; therefore, this alternative qualifies identified as the “environmentally superior” alternative when compared to the proposed project and other alternatives. Without development, no impacts would occur. In the case of the alternative design, potential impacts would be anticipated to be the same or greater than the proposed project because of the greater area within the nearly 127-acre property that would be affected by the development of the seven lots. In the case of either the Hunt Club or Golf Course alternative, potential impacts related to landform alteration, soils and geology, aesthetics, and biological resources would potentially be greater than those identified for the proposed project. In addition, the implementation of these alternatives could also result in additional impacts (e.g., noise, air quality, traffic, water quality, etc.) that would not occur with the proposed project. Therefore, neither would be environmentally superior. As a result, the proposed project is “environmentally superior” when compared to the alternatives to the proposed project identified in this section.

Table 7-1
Comparison of Alternatives
Coto de Caza Specific Plan Amendment

Environmental Topic	Alternative				
	Proposed Project	No Project/No Development ¹	Alternative Design ²	Hunt Club	Golf Course
Land Use	N/I	–	o	o	o
Hydrology/Water Quality	LTS	–	+	+	+
Biological Resources	S/I (M)	–	+	+	+
Soils and Geology	S/I (M)	–	+	+	+
Aesthetics	LTS	–	o	+	+
¹ Environmentally Superior Alternative. ² Environmental Superior of the remaining alternatives; however not environmental superior when compared to the proposed project. <u>LEGEND</u> <u>Proposed Project</u> N/I – No Impact LTS – Less than Significant Impact S/I(M) – Significant Impact (Mitigated) <u>Alternatives</u> – Lesser Impact than the Proposed Project o Same impacts as the Proposed Project + Greater impact than the Proposed Project					